



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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August 23, 2023

VIA ECF

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 11201

Re: Labombard v. Harrel, et al., 22-CV-2196 (LJL)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of York, and the attorney representing the City in this matter. I write with plaintiff's consent to [respectfully request a one week extension for the parties' joint status letter from August 25, 2023 to September 1, 2023.](#) (See ECF No. 76). This is the first request to adjourn the deadline at issue.

This is a civil rights case in which plaintiff alleges former Corrections Officer Brian Harrell assaulted him on numerous occasions during his pretrial detention at Manhattan Detention Center from July 2018 to August 2019. As against the City, plaintiff seeks relief under Monell v. Dep't of Social Sys., 436 U.S. 658 (1978). This case was recently transferred from the Hon. Lewis J. Liman to Your Honor on August 11, 2023, and Your Honor has asked the ordered the parties to submit a joint filing on the factual, legal, and procedural posture of this case thus far. (See ECF No. 76).

I request this extension in light of a number of other work obligations I face in the coming days, and the anticipation that opposing counsel may desire to meet and confer before final submission of the joint letter, which may be difficult in light of impending deadlines.

The case is currently scheduled for a status conference on September 8, 2023. While I do not herein request an adjournment for that conference, should the Court be inclined to grant the

extension to the parties' deadline to file a joint status update and also require additional time to review the forthcoming submission, I do not foresee any scheduling issues the week following September 8, 2023 that preclude such a modification, with the exception of a conference before the Hon. James L. Cott at 11 am on September 12, 2023.

Thank you for your consideration herein.

Respectfully Submitted,



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cc: **VIA ECF**
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Counsel for Plaintiff

The request for an extension is GRANTED. The status letter due August 25, 2023, will now be due September 1, 2023. The conference set for September 8, 2023, will proceed as planned.

SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: August 24, 2023